

CYNTHIA SEMBACH,

Plaintiff,

v.

LAKEVIEW LOAN SERVICING, LLC
M&T BANK, and SAFEGUARD
PROPERTIES MANAGEMENT, LLC

Defendants.

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) Case No. 1:20-cv-00752
) Honorable Judge Andrea R. Wood
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Defendant, Safeguard Properties Management, LLC, (“Safeguard”) by and through its attorneys, Tribler Orpett & Meyer, P.C.,) moves this Court for an order extending the time within which it may respond to Plaintiff’s Discovery Requests. In support of this motion, the Defendant states as follows:

2. On December 8, 2020, co-defendants' Lakeview Loan Servicing, LLC and M&T Bank filed a Motion to Stay Discovery, to which Safeguard joined in and did not object. (Dkt. #59)

3. While that motion to stay remains pending, Safeguard needs additional time to respond to plaintiff's discovery requests, given the amount and extent of the requests identified above, and due to the fact that many of the principals involved at Safeguard are not as accessible during the time when they are due.

4. Safeguard contacted lead counsel for plaintiff, Mohammed Badwan, on the morning of December 21, 2020, and he has no objection to this motion.

5. This is Safeguard's first request for an extension as to these discovery requests and this motion is not made for purposes of delay or prejudice, but in the interests of justice.

WHEREFORE, Defendant, Safeguard Properties Management, LLC, respectfully requests that the Court enter an order extending the date for the Defendant to respond to Plaintiff's Discovery Requests until January 27, 2021.

Respectfully submitted,

s/ Panos T. Topalis
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Safeguard Properties Management, LLC's motion for extension of time to respond to Plaintiff's discovery requests was served upon:

Attorney for Plaintiff

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service was accomplished pursuant to ECF as to Filing Users and complies with LR 5.5 as to any party who is not a Filing User or represented by a Filing User by mailing a copy to the above-named attorney or party of record at the address listed above, from 225 W. Washington Street, Suite 2550, Chicago, IL 60606, prior to 5:00 p.m. on the 21st day of December, 2020, with proper postage prepaid.

s/Panos T. Topalis
an Attorney